

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DENISE KRAVITZ, and LORI WARREN :
individually and on behalf of similarly :
situated female employees, :

Plaintiffs, :

v. :

CENTENNIAL SCHOOL DISTRICT, :

Defendant. :

Case No. 2:23-cv-00888-MMB

JURY TRIAL DEMANDED

JOINT STIPULATION AND ORDER

The parties hereto, through their respective undersigned counsel, respectfully submit this Joint Stipulation that all further proceedings in this case be stayed, and this case be placed on the Court's civil suspense docket, pending resolution of the consolidated cases of *Marinello, et al. v. Central Bucks School District*, No. 2:21-cv-02587-MMB ("*Marinello*"), and *Cartee-Haring v. Central Bucks School District*, No. 2:20-cv-01995-MMB ("*Cartee-Haring*"), pursuant to the requirements of Fed. R. Civ. P. 1.

1. This putative collective action involves claims under the Equal Pay Act that women teachers employed by Centennial School District ("District") were subjected to gender discrimination in their compensation because men teachers were treated more favorably than women teachers in being given credit for prior teaching experience for purposes of placement on applicable salary scales.

2. These claims are the same or similar as the claims being litigated in the *Marinello* and *Cartee-Haring* cases.

3. The *Marinello* and *Cartee-Haring* cases are much further along than this case with collective action certification having been completed in *Marinello*, and discovery completed in all of the consolidated cases. In fact, the parties shall file their motions for summary judgment in these cases by April 5, 2024, as ordered by the Court.

4. In contrast, this case is still in the relatively early stage of pre-certification discovery.
5. Counsel for the Plaintiffs and Defendant in *Marinello/Cartee-Haring* are the same as they are in this case.
6. Legal issues that will be addressed by the Court in *Marinello/Cartee-Haring* are the same or similar to those that are at issue in this case, and the parties in this case will likely be impacted by the rulings of the Court in *Marinello/Cartee-Haring* which could result in a substantial reduction in the expenses in this case and result in the more just and expeditious determination of this case.
7. Accordingly, the parties request that all further proceedings in this case be stayed, and this case be placed on the Court's civil suspense docket, pending resolution of the consolidated cases of *Marinello/Cartee-Haring*.
8. Upon the determination of *Marinello/Cartee-Haring* in this Court, the parties shall so inform the Court and the Court shall issue such further orders as are appropriate to activate and resume this action.

Respectfully submitted,

/s/ Michael I. Levin
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APPROVED AND SO ORDERED THIS ____ DAY OF _____, 2024

MICHAEL M. BAYLSON, U.S.D.J.